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April 14, 2025

VIA ECF

Honorable Miroslav Lovric
United States District Court
Northern District of New York
15 Henry Street
Binghamton, New York 13901

Re: *Shara v. Binghamton Precast & Supply Corp. et al.*
Civil Action No. 3:23-cv-135

Dear Judge Lovric:

Please accept this letter as parties' joint status report pursuant to your most recent text order. There are limited outstanding discovery matters at this juncture, but they have been difficult for the Defendants to complete logistically. However, the parties have come to an agreement whereby the Plaintiff will be able to physically review the paper files which may contain responsive, discoverable materials. Further, the Defendants are optimistic we will be able to produce complete e-discovery responses to email requests within the next three weeks. The e-discovery has been delayed due to the migration of files.

Given these updates and the current status, it is unlikely discovery will be fully completed by May 5, 2025, but document discovery should be completed by June 5, 2025. As such, we humbly request an additional 90-day extension for the completion of discovery.

Very truly yours,

BOND, SCHOENECK & KING, PLLC



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cc: All counsel of record (via ECF)